

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No.: 24-cv-20112**

HUGO BOSS TRADE MARK MANAGEMENT  
GMBH & CO. KG,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED  
LIABILITY COMPANIES, PARTNERSHIPS, AND  
UNINCORPORATED ASSOCIATIONS IDENTIFIED  
ON SCHEDULE A,

Defendants.

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**PLAINTIFF'S *EX PARTE* MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff HUGO BOSS TRADE MARK MANAGEMENT GMBH & CO. KG ("Plaintiff" or "HUGO BOSS"), by and through its undersigned counsel and pursuant to S.D. Fla. L.R. 5.4(b)(1), respectfully moves for an order allowing Plaintiff to file under seal Schedule A, which identifies Defendants to the above-styled action, and in support thereof respectfully refers the Court to the following Memorandum of Law.

**MEMORANDUM OF LAW**

Good cause exists for the requested order. In this action, Plaintiff is requesting this *ex parte* relief based on claims for trademark counterfeiting. Sealing this portion of the file is necessary to prevent Defendants from learning of these proceedings prior to the execution of a temporary restraining order. If Defendants were to learn of these proceedings prematurely the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. *See Dell Inc. v. BelgiumDomains, LLC*, Case No. 07-22674, 2007 U.S. Dist. LEXIS 98676, at \*19 (S.D. Fla. Nov. 21, 2007) (granting motion to seal where the defendants, who operate their counterfeiting business electronically, "will likely destroy evidence or move it out of the jurisdiction" if provided with advance notice of the plaintiff's filings). Once a temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal this document.

As Defendants engage in illegal trademark counterfeiting activities, Plaintiff has no reason to believe Defendants will make their assets available for or will adhere to the authority of this Court any more than they have adhered to federal trademark laws.

WHEREFORE, Plaintiff respectfully requests that Schedule A remain under seal until the Court has the opportunity to rule on Plaintiff's request for temporary *ex parte* relief and, if granted, the relief ordered therein has been effectuated. At that time, all pleadings and orders, will be made available to Defendants.

Dated: January 16, 2024

Respectfully submitted,

By: /s/ Alisha Moriceau

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